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October 5 2009

RE: NEASE CHEMICAL SUPERFUND SITE
COLUMBIANA COUNTY
FEASIBILITY STUDY
OHIO EPA COMMENTS

Ms. Mary Logan
Remedial Project Manager
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Logan:

Below are Ohio EPA's comments on the proposed groundwater delineation activities for Operable Unit 2 of the Nease Chemical Superfund Site, located in Salem, Ohio. The delineation activities were submitted by Golder Associates, Inc., on behalf of Rutgers Organics Corporation (ROC) and received by the Agency on September 21, 2009.

Briefly, Ohio EPA concurs with the proposed location of the additional downgradient well, TW09-49, at However, the data from this well should be reviewed in context with previous data from upgradient wells; see the specific comments below. Also, a potential additional source area may exist in Exclusion Area A — please refer to the specific comments below:

Background:

The chemicals of concern at operable unit (OU) 2 of the Nease Site in soils and ground water include several volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), and pesticides. Pre-design field activities, completed in June 2009, included installation of six wells (TW09-41, TW09-42, TW09-43, TW09-44, TW09-45, and TW09-46) surrounding the wells that have previously shown dense non aqueous phase liquids (DNAPL) in the center of the plume area (surrounding wells TW06-36 and TW06-21). These six wells were installed to identify the limits of DNAPL. The activities also included the installation of two monitoring wells, on private property at 1229 Benton Road, to identify the limits of contamination to the south. Because these (latter) two wells identified total volatiles at concentrations of 145 microgram per liter (ug/l) in well TW09-47 and at 7,770 ug/l in well TW09-48, an additional well is proposed approximately 100 feet downgradient (south) of TW09-48.

Specific comments on recent groundwater investigations and planned activities:

1. **Ohio EPA concurs with the proposed location of an additional downgradient well, TW09-49 at :**

   The proposed location and distance downgradient of existing wells appears appropriate for continued delineation of extent of contamination. However, based on the results from this well, additional well(s) may be needed in the downgradient direction.

2. **Please provide an interpretation of the total VOC concentrations in monitoring wells on the property at**

   Concentrations of total VOCs consistently decrease downgradient in a southerly direction away from the former Nease facility. However, on the property at 1229 Benton Road, concentrations show an increase from 2,151 ug/l in upgradient well TW06-28 to 7,770 ug/l in well TW09-48. The interpretation of these results may be useful in supporting remedial design.

3. **Delineation of a potential area of high concentrations in Exclusion Area A:**

   The June 2007 Baseline Conditions Technical Memorandum report identified two borings that were drilled, but were not completed as wells, because they were identified as "high impacted areas." These borings were identified as TW06-25 and TW06-38. The area near TW06-25 was further, but not completely defined with the installation of wells TW09-43, 44, and 45. The area around TW06-38 was not further defined; the nearest wells are at least 100-150 feet away.

   In order factor information on potential source areas into the final remediation design, additional wells are necessary to delineate this area. This will also help determine if a DNAPL source is present (or not) in Exclusion Area A.

4. **Sampling of the six new wells installed to delineate the location of DNAPL should be conducted in accordance with the procedures in the Pre-Design Investigation Work Plan:**

   The new monitoring wells installed in June 2009 to delineate the location of DNAPL were not sampled. Ohio EPA considers the sampling of these six new wells very important to the design of the final remedy and understanding

of the contaminant plume characteristics. These wells should be sampled according to the procedures in the Pre-Design Investigation Work Plan.

Finally, Ohio EPA's hydrogeologist, Kevin Palombo, is available to provide field oversight of the monitoring well installation and sampling, as necessary. Please request that ROC/Golder coordinate directly with him on planned field activities.

Please let me know if our team can clarify any of the above.

Sincerely,

Sheila Abraham, Ph.D.
Site Coordinator/Risk Management Specialist
Division of Emergency and Remedial Response

SA/kss

ec: Timothy Christman, Remedial Design Specialist, Ohio EPA, DERR, CO
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